

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARBITUS BIOPHARMA CORPORATION and GENEVANT SCIENCES GmbH,)	
Plaintiffs,)	
v.)	
MODERNA, INC. and MODERNATX, INC.,)	
Defendants.)	C.A. No. 22-252-JDW
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MODERNA, INC. and MODERNATX, INC.,)	
Counterclaim-Plaintiffs,)	
v.)	REDACTED - PUBLIC VERSION
ARBITUS BIOPHARMA CORPORATION and GENEVANT SCIENCES GmbH,)	
Counterclaim-Defendants.)	

**EXHIBITS A-F, I-J, O-P, R-S AND U-V TO THE
DECLARATION OF MARK C. MCLENNAN IN SUPPORT OF
Moderna's MOTION TO EXCLUDE THE EXPERT OPINIONS OF
CATHARINE LAWTON, GEORG SCHUSTER, PH.D., MICHAEL MITCHELL, PH.D,
PETER J. PITTS, AND ALEX M. BRILL**

VOLUME 1

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Defendants.)	C.A. No. 22-252-JDW
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MODERNA'S MOTION TO EXCLUDE THE EXPERT OPINIONS OF
CATHARINE LAWTON, GEORG SCHUSTER, PH.D., MICHAEL MITCHELL, PH.D.,
PETER J. PITTS, AND ALEX M. BRILL**

I, Mark C. McLennan, hereby declare and state as follows:

1. I am over the age of eighteen and, if called as a witness, could competently testify to the matters set forth herein.
2. I am an attorney at Kirkland & Ellis LLP, and counsel to Defendants and Counterclaim-Plaintiffs Moderna, Inc. and ModernaTX, Inc. ("Moderna") in this matter.
3. I make this declaration in support of Moderna's *Daubert* Motion to Exclude the Expert Opinions of Catharine Lawton, Georg Schuster, Ph.D., Michael Mitchell, Ph.D., Peter J. Pitts, and Alex. M. Brill.

4. Attached as Exhibit A is a true and correct copy of the November 25, 2024 Expert Report of Catharine M. Lawton, with accompanying Exhibits A and B, and excerpts of the accompanying Schedules.

5. Attached as Exhibit B is a true and correct copy of the February 14, 2025 Rebuttal Expert Report of Catharine M. Lawton.

6. Attached as Exhibit C is a true and correct copy of the March 21, 2025 Reply Expert Report of Catharine M. Lawton.

7. Attached as Exhibit D is a true and correct copy of the April 30, 2025 Deposition Transcript of Catharine Lawton.

8. Attached as Exhibit E is a true and correct copy of the November 25, 2024 Opening Expert Report of Dr. Michael Mitchell.

9. Attached as Exhibit F is a true and correct copy of the March 21, 2025 Reply Expert Report of Dr. Michael Mitchell.

10. Attached as Exhibit I is a true and correct copy of excerpts from the February 11, 2025 Rebuttal Expert Report of Owen Shea Fenton, Ph.D.

11. Attached as Exhibit J is a true and correct copy of excerpts from the February 14, 2025 Rebuttal Expert Report of Robert Prud'homme, Ph.D.

12. Attached as Exhibit O is a true and correct copy of excerpts from the May 8, 2024 Deposition Transcript of Joseph Alan Schariter II.

13. Attached as Exhibit P is a true and correct copy of excerpts from the June 7, 2024 Deposition Transcript of Donald M. Parsons.

14. Attached as Exhibit R is a true and correct copy of a Genevant Sciences GmbH license bearing bates GENV-00023616 through GENV-00023663.

15. Attached as Exhibit S is a true and correct copy of a Genevant Sciences GmbH license bearing bates GENV-00022307 through GENV-00022416.

16. Attached as Exhibit U is a true and correct copy of the March 19, 2025 Reply Expert Report of Dr. Georg Schuster.

17. Attached as Exhibit V is a true and correct copy of the January 28, 2025 Supplemental Opening Expert Report of Catherine M. Lawton with Amended Lawton Schedule 6.1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED in New York, New York, this 7th day of November 2025.

/s/ Mark C. McLennan
Mark C. McLennan

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 16, 2025, upon the following in the manner indicated:

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/s/ Travis J. Murray

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